



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

*The Silvio J. Mollo Building
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New York, New York 10007*

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VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Saudia Sinclair*, 21 Cr. 435 (VEC)

Dear Judge Caproni:

The parties respectfully submit this joint letter in advance of the December 2, 2021 pretrial conference in the above captioned case. The parties request an adjournment of 45 days. The parties are actively engaged in discussions regarding a potential pretrial resolution in this matter. Specifically, defense counsel has submitted a mitigation request that the Government is currently considering in advance of a potential plea offer. An adjournment will allow the parties to continue and finalize these discussions. Should the Court grant this request, we further request that time be excluded under the Speedy Trial Act from December 31, 2021 until the date of the next-scheduled conference. The Government respectfully submits that the proposed exclusion would be in the interest of justice as it would allow the parties to continue and finalize pretrial negotiations. Defense counsel has no objection to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Ashley C. Nicolas
Assistant United States Attorney
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CC: Counsel of Record by ECF

Application GRANTED. The conference currently scheduled for Thursday, December 2, 2021, at 3:00 p.m. is hereby ADJOURNED until **Thursday, January 20, 2022, at 3:00 p.m.** The period between December 31, 2021, and January 20, 2022 is hereby excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.

 12/1/21

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE